1	PAUL ALAN LEVY					
2	(pro hac vice)					
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6	PHILLIP R. MALONE California Bar No. 163969					
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11	Attorneys for Plaintiff Mockingbird Foundation					
12	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA					
13	San Jose Division					
14	ERIK ANDERSON,)	Case No. 5:19-cv-05630-EJD			
15	Plaintiff,)	STIPULATED MOTION TO EXTEND TIME TO MOVE FOR ATTORNEY			
16	V.)	FEES AND EXPENSES			
17	STEVEN HIRSCH and MARK SELIGER,)				
18	Defendants.)				
19	Pursuant to Local Rule 6-2, all parties hereby stipulate and request that the Court enter an order					
20	extending plaintiff's time to file a motion for an award of attorney fees, costs and expenses until April 30,					
21	2020. Good cause exists for the request.					
22	1. The case was dismissed on March 20, and a motion for attorney fees, costs and expenses would					
23	be due on April 3. The parties believe that the meet and confer process could be more effective if they had					
24	more time before any motion is filed.					
25	2. The parties agree that, considering the exigencies of the present coronavirus crisis, an extension					
26	of a full month would permit a thorough meet and confer process.					
27	3. The parties are in agreement, therefore, that plaintiff's date to file a motion for an award of					
28	attorney fees, costs and expenses should be extend	ed to Ap	oril 30.			

1	DATED: March 26, 2020		IC CITIZEN LITIGATION GROUP	
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3		By:	/s/ Paul Alan Levy	
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15		Dru	/a/ Mathaw V. Highaa	
16		By:	/s/ Mathew K. Higbee Mathew K. Higbee	
17			California Bar No. 241380 Telephone: (714) 361-1967	
18			Facsimile: (866) 534-7049 mathewhigbee@higbeeasociates.com	
19		Attorne	ey for Defendants	
20	[PROPOSED] ORDER			
21	Pursuant to stipulation, plaintiff's deadline to file any motion for attorney fees, expenses and costs is			
22	extended to April 30, 2020.			
23				
24	IT IS SO ORDERED		-	
25	Dated: 3/26/2020		Thillyh	
26			EDWARD J. DAVILA United States District Judge	
27				
28				
20				